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December 30, 2005

Mary Cottrell, Secretary
Department of Telecommunications and Energy
Two South Station, Second Floor
Boston, Mass. 02110

RE: Boston Edison Co. et al., D.T.E. 05-85

Dear Secretary Cottrell:

Please accept this as the comment of the Low-Income Energy Affordability Network (LEAN), late-filed due to the undersigned's travel schedule. LEAN is a signatory to the settlement in the above-captioned docket.

While LEAN supports the entire settlement, the purpose of this comment is to address objections that have been made to the arrearage management provisions therein (Settlement par. 2.24, Exh. NSTAR-23). The objections overlook the fact that arrearage management has been mandated by the General Court. St. 2005, c. 140, sec. 17(a). The statute does not foreclose efforts to advance the General Court's policy of arrearage management in fora in addition to the required generic proceeding.

It should also be noted that, contrary to the implication of the Cape Light Compact comment that low-income customer protection should only be paid for by utility shareholders, Cape Light itself operates an excellent low-income efficiency program that is underwritten, by statute, by ratepayer funds.

For these reasons, LEAN urges the Department to approve the proposed settlement of this docket.

Respectfully submitted,

LOW-INCOME ENERGY AFFORDABILITY NETWORK,
By its attorney,

ec: Shaela McNulty Collins, Hearing Officer
Joseph Rogers, Alexander Cochis, Colleen McConnell, AG

Douglas Horan, Ellen Anglely, NSTAR
Robert Werlin, NSTAR
Kevin Galligan, CLC
Jonathan Klavens, Jeffrey Bernstein, CLC
Service List